

EXHIBIT 2

From: [Champion, Anne](#)
To: [Steven Donziger](#); [Mastro, Randy M.](#)
Cc: [Neuman, Andrea E.](#); [Herrera, Alejandro A.](#)
Subject: RE: Chevron Corp v Donziger
Date: Friday, June 29, 2018 5:17:00 PM

Steven: Please confirm you will produce all other documents responsive to Chevron's requests by no later than Wednesday. Thank you.

Anne Champion

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
200 Park Avenue, New York, NY 10166-0193
Tel +1 212.351.5361 • Fax +1 212.351.5281
ACHampion@gibsondunn.com • www.gibsondunn.com

From: Steven Donziger <sdonziger@donzigerandassociates.com>
Sent: Friday, June 29, 2018 3:50 PM
To: Mastro, Randy M. <RMastro@gibsondunn.com>
Cc: Champion, Anne <ACHampion@gibsondunn.com>; Neuman, Andrea E. <ANeuman@gibsondunn.com>; Herrera, Alejandro A. <AHerrera@gibsondunn.com>
Subject: Re: Chevron Corp v Donziger

My best memory is that the agreement I gave you after court is the retainer agreement I was referring to the in the deposition. I also am trying to determine if there is a signed version (by me) of the document I gave you after court in the possession of the FDA; if there is, I will produce that. If not, I plan to sign the agreement soon and afterwards I will produce that version.

I am away the rest of the day and through the weekend but I will be available Monday for communication.

Steven

From: Mastro, Randy M. <RMastro@gibsondunn.com>
Sent: Friday, June 29, 2018 10:01:57 AM
To: Steven Donziger
Cc: Champion, Anne; Neuman, Andrea E.; Herrera, Alejandro A.
Subject: Fw: Chevron Corp v Donziger

Steve, please confirm that this is the agreement that you gave me after court (as well as an English translation of it, all pages bates-stamped to reflect the agreement's production by you), and that it is the document you represented to the Court after yesterday's hearing is your latest retention agreement with the Frente.

Also, please confirm whether you have the same document actually signed by both parties and notarized. If so, you should immediately produce the document signed by both parties and notarized.

Finally, this document is dated less than eight months ago. You testified at your deposition that you entered into such an agreement "two, three years ago." Donziger Dep. Tr. 59:19. Please confirm whether there are any other such agreements you have entered into with the Frente since the one previously produced from 2011. And if so, please produce them immediately as well.

As time is of the essence, we will expect your written response before close of business today. Thanks.

From: AChampion@gibsondunn.com

Sent: June 29, 2018 8:58 AM

To: RMastro@gibsondunn.com

Subject: Chevron Corp v Donziger

This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

From: [Champion, Anne](#)
To: [Steven Donziger](#)
Cc: [Neuman, Andrea E.](#); [Herrera, Alejandro A.](#); [Mastro, Randy M.](#)
Subject: RE: Chevron Corp v Donziger
Date: Tuesday, July 24, 2018 11:21:00 AM

Dear Steven,

I am writing to follow up on my June 29 email below requesting that you “produce all other documents responsive to Chevron’s requests by no later than Wednesday,” July 4. With the exception of the document you provided on July 5, we have not received any of the documents that you agreed at your deposition to search for and produce. You have also failed to produce the “hundreds” of documents withheld on First Amendment grounds, despite the fact that Judge Kaplan has ruled that claim to be without merit. Dkt. 2009, Dkt. 2045.

We have already met and conferred with you about these discovery obligations. Unless you comply without further delay, this week we will move to compel production of the missing documents and for another day of deposition. Your discovery obligations extend to materials within your possession, as well as materials belonging to you that are under the custody of others, *e.g.*, the boxes from Joshua Rizack that Ms. Sullivan or her attorneys are holding. See Dkt. 2009 at 2 (“Donziger’s contention that he cannot or should not be compelled to furnish documents and information that are within his control but not in his immediate physical possession is frivolous.”). You must also ensure that your diligence in searching for responsive materials is reasonable, as you admitted at your June 25 deposition that your prior efforts failed to capture even basic materials, like emails you sent and received about the Elliott solicitation.

Best regards,
Anne

Anne Champion

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